

1 YOLANDA HUANG, SBN 104543  
2 P.O. Box 5475  
3 Berkeley, CA 94705  
4 Tel: (510) 329-2140/ Fax: (510) 580-9410

5 DAN SIEGEL, SBN 56400  
6 ANNE WEILLS, SBN 139845  
7 SIEGEL & YEE  
8 499 14<sup>th</sup> Street, Suite 300  
9 Oakland, CA 94612  
10 Tel: (510) 839-1200/ Fax: (510) 444-6698

11 Attorneys for Plaintiffs  
12 STEVEN ANGELL, *et al.* and on  
13 behalf of the proposed class

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

STEVEN ANGELL, MILES AVERY,  
MOLLY BATCHELDER, SRI LOUISE  
AKA LOUISE COLES, CICILY COOPER,  
SHAREEF ELFIKI, THEODORE  
HEXTOR, and LINDSAY WEBER,  
individually and on behalf of others similarly  
situated,

Plaintiffs,  
vs.

CITY OF OAKLAND, COUNTY OF  
ALAMEDA, HOWARD JORDAN,  
JEFFREY ISRAEL, ERIC BRESHEARS,  
RON YELDER, DARREN ALLISON,  
STEVE TULL, EDWARD TRACEY,  
ANTHONY RACHAL, SEAN WHENT,  
GREGORY J. AHERN, BRETT KETELES,  
CARLA KENNEDY, DAVID BRADY,  
GREGORY L. MORGADO, KERRY  
JACKSON, DOES 1-250,

Defendants.

Case No. C13-0190 NC

STIPULATION AND APPLICATION FOR  
EXTENSION OF TIME FOR FILING OF  
THE MOTION FOR FINAL APPROVAL  
~~[Proposed]~~ ORDER AS MODIFIED

Complaint Filed: January 14, 2013

The parties herein hereby stipulate and jointly apply to the Court for relief from existing deadlines in the above-referenced matter as follows:

By order dated January 5, 2015 (Document 72), the Hon. Nathanael Cousins of this Court ordered Plaintiffs to file their motion for final approval and any supplemental filings in support of the requested incentive award and attorneys fees and costs, within 14 days of the date the class notice is disseminated to the class members as provided in the settlement agreement. Per the settlement agreement, for all class members who fail to respond within 45 days of the mailing of the notice, plaintiffs will make every effort to contact those class members through direct contact,

The Court's order of January 5, 2015 set April 1, 2015 as the hearing date for the motion for final approval.

The class notice was mailed to class members on January 15, 2015, and class members have begun submitting completed claim forms. In light of the 45 day window contained within the settlement agreement for the initial period for responses from class members, the parties believe that it is in the best interest of justice and judicial economy, to wait until the 45 day period has passed in order to assess the level of objections to the terms of the settlement, including the incentive awards and attorneys fees, and respectfully request that plaintiffs be provided an extension of time to March 4, 2015 in which to file the motion for final approval and any supplemental filings in support of the requested incentive award and attorneys fees and costs.

DATED: January 28, 2015

YOLANDA HUANG, ESQ.

By: /s/ Yolanda Huang  
YOLANDA HUANG, ESQ.  
Attorneys for Plaintiffs

DATED: January 28, 2015

SIEGEL & YEE

By: /s/ Dan Siegel  
DAN SIEGEL, ESQ.  
Attorneys for Plaintiffs

1 DATED: January 28, 2015

LOZANO SMITH

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By: /s/ William E. Simmons  
WILLIAM E. SIMMONS, ESQ.  
Attorneys for Defendants  
CITY OF OAKLAND, et al

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DATED: January 28, 2015

BOORNAZIAN, JENSEN & GARTHE

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A Professional Corporation

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By: /s/ Gregory J. Rockwell  
GREGORY J. ROCKWELL, ESQ.  
Attorneys for Defendants  
COUNTY OF ALAMEDA, et al.

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GOOD CAUSE appearing therefor, and the parties having so stipulated, the Court hereby  
GRANTS the parties' joint application for extension of time for filing the motion for final approval.

February 13, 2015.

Last date for plaintiffs to file motion for class certification: ~~March 4, 2014~~

Dated: January 30, 2015

